

IN THE CIRCUIT COURT IN AND FOR ESCAMBIA COUNTY, FLORIDA

STATE OF FLORIDA

vs.

DOROTHEA RHODES VEGA,

Defendant

CLERK NO.: 1712CF006311A

DIVISION: E

AGENCY NO.: ECSO12OFF034095

**DISCOVERY EXHIBIT**

The State of Florida, represented by and through the undersigned Assistant State Attorney, hereby responds to the Defendant's Notice of Discovery pursuant to Florida Rule of Criminal Procedure 3.220. Rule 3.220 defines Category A Witnesses, Category B Witnesses and Category C Witnesses. Category A witnesses who were present when a recorded or unrecorded statement was taken from or made by a defendant or codefendant have been separately identified below as Category A Statement Witness.

I

**Category A Witnesses**

TABATHA HEWSTON, ADOPTION SUPPORT TEAM, ESCAMBIA COUNTY

**EXPERT WITNESS(ES):** JULIAN A SALINAS, PHD, EMERALD COAST PSYCHOLOGY, LLC,  
26 OAK AVENUE, PANAMA CITY, FL 32405

**Category A Statement Witnesses**

J.A.V., C/O PARENT OR GUARDIAN, 3285 IDLEWOOD DR, PENSACOLA, FL 32505

ERICA BROWN-ADAMS, WARRINGTON MIDDLE SCHOOL, 450 S OLD CORRY FIELD RD,  
PENSACOLA, FL 32507

COURTNEY FRANK CLANTON #ECSD295, 1700 W LEONARD STREET, PENSACOLA, FL  
32501

TAIIA CLARKE, WARRINGTON MIDDLE SCHOOL, 450 S OLD CORRY FIELD RD, PENSACOLA,  
FL 32507

JOE ANN DOSS, WARRINGTON MIDDLE SCHOOL, 450 S OLD CORRY FIELD RD,  
PENSACOLA, FL 32507

IRISH ENGLISH JONES, WARRINGTON MIDDLE SCHOOL, 450 S OLD CORRY FIELD RD,  
PENSACOLA, FL 32507

AAYANA MARJOE MCCREARY, CPT - GULF COAST KIDS HOUSE, 3401 NORTH 12<sup>TH</sup> AVE,  
PENSACOLA, FL 32503

GILBERT RAMOS VEGA, 3285 IDLEWOOD DR, PENSACOLA, FL 32505

PANAMA CITY  
CLERK OF CIRCUIT COURT  
ESCAMBIA COUNTY  
2013 FEB - 1 A  
CIRCUIT CRIMINAL  
FILED & RECORDED

### Category B Witnesses

CUSTODIAN OF RECORDS(ECSD COMMUNICATIONS), ECSD COMMUNICATION DIVISION,  
1700 W LEONARD STREET, PENSACOLA, FL 32501-1122

### Category C Witnesses

**Copies of the following document/exhibits are attached:** Offense Report, Warrant Service Return, Driver License Transaction page; DCF Reports; Offense Report ECSO12OFF034295, ECSO10OFF032778, ECSO22OFF004720, ECSO11OFF005569. ECSO11OFF05813, ECSO12OFF038103 & ECSO12OFF037136, E-mail from Tabatha Hewston; CD-R or Courtsmart for 12/21/12; DVD+R of CPT video; CPT records; DVD+R EX 1; DVD+R EX 4; 2 CD-R Photo; Photos; Emerald Coast Psychological Evaluation Report; \*If copy is needed of DVD's or CD's please send a blank and one will be provided or you may request to review them\*

### II

The following information is available, as indicated, to inspect, copy, test, or photograph either at the Office of the State Attorney or at the office of the respective law enforcement agency involved - upon notice either to the undersigned or the Evidence Custodian at the appropriate law enforcement agency, in any manner mutually agreeable to the defense and prosecutor, or as ordered by the Court:

☒ Yes ☐ No

(1) The statement of any person whose name is furnished in compliance with paragraphs above.

☒ Yes ☐ No

(2) Written or recorded statements and the substance of any oral statements made by the defendant, including a copy of any statements contained in police reports or report summaries, together with the name and address of each witness to the statements.

☐ Yes ☒ No

(3) Written or recorded statements and the substance of any oral statements made by a codefendant if the trial is to be a joint one.

☐ Yes ☒ No

(4) Grand jury minutes that contain testimony of the defendant.

☐ Yes ☒ No

(5) Tangible papers or objects which were obtained from or belong(ed) to the accused.

☐ Yes ☒ No

(6) Material or information which has been provided by a confidential informant.

☐ Yes ☒ No

(7) Whether there has been electronic surveillance, including wiretapping, of the premises of the defendant, or of conversations, to which the defendant was a party, and any documents relating thereto.

☐ Yes ☒ No

(8) Whether there have been any search or seizure and any documents relating thereto.

X Yes \_\_\_ No

(9) Reports or statements of experts made in connection with this case, including results of physical or mental examinations and of scientific tests, experiments or comparisons.

X Yes \_\_\_ No

(10) Tangible papers or objects which the prosecuting attorney intends to use in the hearing or trial and which were not obtained from or belong to the defendant.

### III

Pursuant to law and the "User Agreement" with the Florida Department of Law Enforcement (FDLE), computerized criminal history records (NCIC and FCIC) of individuals obtained by this office may be disseminated **only** to other criminal justice agencies. However, Florida computerized criminal history records (FCIC) may be obtained by writing or calling:

USB  
FDLE  
P. O. BOX 1489  
TALLAHASSEE, FL 32302  
(850) 410-8110

### IV

**Reciprocal Discovery:** By responding to the Defendant's Notice of Discovery, the State hereby requests disclosure of items and matters listed in Fla.R.Crim.P. 3.220(d) in the manner and time frame (**15 days**) set forth in Rule 3.220.

### V

**All information, material and exhibits subject to disclosure by the prosecutor under Rule 3.220, Florida Rules of Criminal Procedure, is available to the defendant to inspect, copy, test, and photograph, at the undersigned Assistant State Attorney's office or at the Law Enforcement Agencies involved in this case(es) during normal working hours, with reasonable notice to the Law Enforcement Agency or the undersigned Assistant State Attorney.**

I HEREBY CERTIFY that a copy or copies of the State's Discovery Exhibit has been furnished to: H.E. ELLIS JR., Attorney for Defendant, 41 North Jefferson Street, Suite 400, Pensacola, FL 32502, by mail/delivery/fax/electronically on 1/31/13.

  
ANDREW MCGRAW  
ASSISTANT STATE ATTORNEY  
GULF COAST KIDS HOUSE  
3401 N 12<sup>TH</sup> AVE  
PENSACOLA, FL 32503  
PHONE: (850) 595-4500  
FLORIDA BAR NO: 0638171